



November 25, 2019

VIA ECF FILING

Honorable Judge George B. Daniels, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 1310
New York, New York 10007

Re: *Dwayne Harris v. The Bronx Parent Housing Network, Inc.*
Index No. 1:18-cv-11681 (GBD)

Dear Judge Daniels:

We represent Defendant the Bronx Parent Housing Network, Inc., in the above-referenced action and write in response to Plaintiff's letter of November 14, 2019, to correct the record.

As an initial matter, contrary to Plaintiff's representation, Defendant fully answered and responded to Plaintiff's discovery demands. Defendant is supplementing its answers and responses in accordance with Federal Rule 26 and not because of any alleged deficiencies. Further, Defendant timely responded to Plaintiff's discovery demands and, therefore, Plaintiff's claims concerning arbitrary deadlines should be disregarded.

In addition, Defendant is continuing its review of Plaintiff's answers and responses to Defendant's interrogatories and document demands and has made note of numerous deficiencies that it will provide to Plaintiff shortly. We intend to continue our good faith efforts prior to making any application to the Court and believe Plaintiff should do the same.

For these reasons, Plaintiff's request is premature.

Nothing herein shall be construed as a waiver of Defendant's rights and remedies in contract or in law, all of which are hereby expressly reserved; nor does Defendant waive any other rights or remedies available at law or in equity, all of which are also hereby expressly reserved.

Respectfully submitted,

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